



ENERGY PROUD

Western States Petroleum Association
California Independent Petroleum Association

State Water Resources Control Board
Public Workshop
August 7, 2014

Oil and Gas Industry Stakeholder Perspectives

What We Will Cover

- Associations Introductions/Background
- Overarching Issues/Concepts
- Existing Regulatory Structure
- SB 4 Requirements
- Considerations for Groundwater Monitoring Criteria
- Additional Considerations



Western States Petroleum Association



CIPA

*California Independent
Petroleum Association*

General Comments

- WSPA and CIPA support implementation of SB 4
- WSPA and CIPA members fully support protecting groundwater that has beneficial uses
- WSPA and CIPA appreciate the opportunity to participate in the dialogue

General Comments

SB 4 adds Section 10783 (c) of the Water Code, which in part reads:

“the state board shall develop model groundwater monitoring criteria to be implemented either on a well-by-well basis for a well subject to well stimulation treatment, or on a regional scale.”

SB 4 focuses the SWRCB’s ground monitoring criteria development on well stimulation operations.

Overarching Issues/Concepts

- DOGGR Well Integrity Standards & Requirements
- Regulatory Certainty and Timelines
- Technical Feasibility
- SB 4 GWM Model Criteria
- One Size Does Not Fit All

Existing Regulatory Structure

- California oil and gas regulations are adequately designed to directly protect drinking water resources.
- DOGGR's existing regulations and well construction standards have a fundamental purpose – to ensure “zonal isolation.”
 - Zonal isolation means that oil and gas – or any other fluids – coming up a well from the productive, underground geologic zone will not escape the well and migrate into other geologic zones, including zones that might contain fresh water.
- Experience indicates that California oil and gas regulations related to well construction are designed to be protective of ground water resources relative to the potential effects of WSTs.

The objective of a groundwater monitoring plan is to provide a secondary method of leak detection, as a back-up to primary well integrity monitoring.

SB 4 Requirements

Senate Bill 4 requires:

- 1) An assessment of the areas to conduct groundwater quality monitoring and their appropriate boundaries.
- 2) A list of the constituents to measure and assess water quality.
- 3) The location, depth, and number of monitoring wells necessary to detect groundwater contamination at spatial scales ranging from an individual oil and gas well to a regional groundwater basin including one or more oil and gas fields.
- 4) The frequency and duration of the monitoring.
- 5) Threshold criteria indicating a transition from well-by-well monitoring to a regional monitoring program.
- 6) Data collection and reporting protocols.
- 7) Public access to the collected data under paragraph (6).

SB 4 Requirements

Senate Bill 4 Ground Water Monitoring Timelines:

- July 1, 2015 - Develop Model Groundwater Monitoring Criteria
- January 1, 2016 – SWRCB Implement Regional Groundwater Monitoring Program
- WSPA and CIPA agree that understanding the effects of oil and gas development, as related to WST activities, is necessary for SB4 implementation of groundwater monitoring.

Considerations for Ground Water Monitoring Criteria

- Site Conceptual Model Approach

- Identify WST Areas of Activity – Current and Future Planned
- Protected Water
- Historical Groundwater Data Review
- Potential Pathways
- Potential Receptors
- Hydrogeological Characteristics
- Analyte List
- Use of existing water supply wells

Additional Considerations

- The groundwater monitoring provisions of SB 4 focus on well stimulation activities.
- Much is actually known about the interaction between oil and gas development activities and groundwater resources.
- Many oilfields throughout California have active groundwater monitoring programs related to WDR permits.

Closing

- WSPA and CIPA appreciate the opportunity to provide feedback.
- Again, we fully support SB 4 Implementation in as timely a manner as possible.
- We look forward to additional stakeholder discussions.